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Assistant General Counsel-Florida

98 JUN 29 PM 4:36

BellSouth Telecommunications, Inc.
150 South Monroe Street
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Tallahassee, Florida 32301
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RECORDS AND REPORTING

June 29, 1998

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 980281-TP MCI Complaint

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Prehearing Statement, which we ask that you file in the captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

- ACK
- AFA
- APP
- CAF
- CMU *Stavara*
- CTR
- EAG NBW/vf
- LEG
- LIN 5
- OPC
- RCH
- SEC
- WAS
- OTH

Sincerely,

Nancy B. White

Nancy B. White (Bul)

cc: All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg II

RECEIVED & FILED
[Signature]
FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
06839 JUN 29 98
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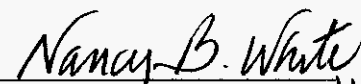
CERTIFICATE OF SERVICE
Docket No. 980281-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served
by U.S. Mail this 29th day of June, 1998 to the following:

Beth Keating
Legal Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

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Tel. No. (850) 222-7500
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MCI Metro Access Transmission
Services, Inc.
Thomas K. Bond
780 Johnson Ferry Road
Suite 700
Atlanta, GA 30342
Tel. No. (404) 267-6315
Fax. No. (404) 267-5992


Nancy B. White (pd)

DOCUMENT NUMBER-DATE

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REC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of MCImetro Access) Docket No.: 980281-TP
Transmission Services, Inc. against)
BellSouth Telecommunications, Inc.)
For Breach of Approved)
Interconnection Agreement)
_____) Filed: June 29, 1998

PREHEARING STATEMENT OF BELLSOUTH TELECOMMUNICATIONS, INC.

BellSouth Telecommunications, Inc. ("BellSouth"), in compliance with the Order Establishing Procedure and Granting Motion to Expedite Hearing Schedule (Order No. PSC-98-0641-PCO-TP), issued May 7, 1998, hereby submits its Prehearing Statement for Docket No. 980281-TP.

A. Witnesses

BellSouth proposes to call the following witnesses to offer testimony on the issues in this docket:

<u>Witness</u>	<u>Issue(s)</u>
Jerry Hendrix (Direct and Rebuttal)	All
W. Keith Milner (Direct and Rebuttal)	8, 10, 12, and 13
William N. Stacy (Direct and Rebuttal)	1-7 and 9

BellSouth reserves the right to call additional witnesses, witnesses to respond to Commission inquiries not addressed in direct or rebuttal testimony and witnesses to address issues not presently designated that may be designated by the Prehearing Officer at the prehearing conference to be held on July 23, 1998.

DOCUMENT NUMBER-DATE

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REGISTRATION/REPORTING

B. Exhibits

Jerry Hendrix	JDH-1	Part A - General Terms and Conditions, Sections 13.3 and 13.8
	JDH-2	Attachment VIII - Business Process Requirements, Section 2.3.1
	JDH-3	Attachment VIII - Business Process Requirements, Sections 5.1.1.1 and 5.1.1.2
	JDH-4	Attachment VIII - Business Process Requirements, Section 2.1.3.1
	JDH-5	Attachment VIII - Business Process Requirements, Section 2.3.2.5
	JDH-6	Attachment VIII - Business Process Requirements, Section 2.2.4.3
	JDH-7	Part A - General Terms and Conditions, Section 13.5
	JDH-8	Attachment VIII - Business Process Requirements, Section 2.1.8
	JDH-9	Attachment VIII - Business Process Requirements, Section 2.3.2.3.1.2
	JDH-10	Attachment VIII - Business Process Requirements, Section 2.2.9.1
	JDH-11	Attachment VIII - Business Process Requirements, Section 2.2.6.1
	JDH-12	Attachment VIII - Business Process Requirements, Section 2.5.3.1
	JDH-13	Attachment IV - Interconnection, Sections 4.2.1 and 4.2.2
	JDH-14	Attachment VIII - Business Process Requirements, Sections 4.1.1 and 4.2.1

	JDH-15	Attachment VIII - Business Process Requirements, Sections 6.1.6 and 6.2
	JDH-16	Attachment III - Network Elements, Sections 7.2.1.11 and 7.2.1.11.4
W. Keith Milner	WKM-1	February 27, 1998 letter from Lee to Keys
	WKM-2	December 11, 1997 e-mail from Turner to Harris
	WKM-3	December 17, 1997 e-mail from Ash to Smith
	WKM-4	Sample letter to ICOs and CLECs
	WKM-5	May 5, 1998 e-mail from Bourne to Myler
	WKM-6	Amendment to Interprise America Agreement
	WKM-7	June 1, 1998 letter from Schmidt to Lee
	WKM-8	BellSouth Local Tandems and Subtending Offices in Florida
	WKM-9	June 2, 1998 letter from Nelson to Arrington
	WKM-10	June 10, 1998 e-mail from Closz to Arrington
William N. Stacy	WNS-1	December 24, 1997 letter from Henry to Fiedler
	WNS-2	January 8, 1998 letter from Fiedler to Henry
	WNS-3	February 11, 1998 letter from Schaefer to Henry
	WNS-4	June 26, 1998 letter from Forbes to Arthur and June 16, 1997 letter from Arthur to Barrett

- WNS-5 August 18, 1997 letter from Schmidt to Barrett
- WNS-6 October 10, 1997 letter from Lee to Henry
- WNS-7 August 20, 1997 letter from Lee to Schmidt
- WNS-8 October 21, 1997 e-mail from Rueblinger to Green
- WNS-9 November 13, 1997 letter from Fiedler to Henry
- WNS-10 December 2, 1997 letter from Siegel to Green
- WNS-11 December 16, 1997 letter from Green to Siegel
- WNS-12 September 5, 1997 letter from Hopkins to Bowers
- WNS-13 November 18, 1997 e-mail from Bowers to Green
- WNS-14 November 24, 1997 e-mail from Bowers to Green
- WNS-15 December 18, 1997 e-mail from Siegel to Green
- WNS-16 April 9, 1998 e-mail from Rueblinger to Arthur
- WNS-17 February 23, 1998 letter from Bowers to Green
- WNS-18 March 9, 1998 letter from Green to Bowers
- WNS-19 March 23, 1998 letter from Bowers to Green

WNS-20	April 9, 1998 letter from Bowers to Arthur
WNS-21	April 23, 1998 letter from Arthur to Bowers
WNS-22	May 6, 1998 letter from Bowers to Arthur
WNS-23	BST Ordering/Pre-Ordering Integration Interface (OP11) Software
WNS-24	December 15, 1997 letter from Daniels to Murdock and others
WNS-25	January 30, 1998 letter from Siegel to Green
WNS-26	August 20, 1997 letter from Lee to Schmidt
WNS-27	PF'd Order Processing Procedures
WNS-28	OSS Screens
WNS-29	Pre-Ordering and Ordering Functions

BellSouth reserves the right to file exhibits to any additional testimony that may be filed under the circumstances identified in Section "A" above. BellSouth also reserves the right to introduce exhibits for cross-examination, impeachment, or any other purpose authorized by the applicable Florida Rules of Evidence and Rules of this Commission.

C. Statement of Basic Position

Notwithstanding MCI's allegations to the contrary, BellSouth has complied with the Telecommunications Act of 1996 (the "Act"), as well as with the terms

and conditions of the BS-MCI Interconnection Agreement. BellSouth has worked diligently and in good faith to facilitate MCI's entry into the local market.

BellSouth will continue to be responsive and cooperative to MCI.

D. BellSouth's Position on the Issues

Issue 1: Has BellSouth provided MCImetro with information about BellSouth's OSS and related databases in compliance with the Telecommunications Act of 1996 and the parties' Interconnection Agreement? If no, what action, if any, should the Commission take?

Position: Yes. OSS materials, updates, and training have been provided to MCI. No action need be taken by the Commission.

Issue 2: Has BellSouth provided MCImetro with the Street Address Guide (SAG) data in compliance with the Telecommunications Act of 1996 and the parties' Interconnection Agreement? If no, what action, if any, should the Commission take?

Position: Yes, BellSouth has made the information in the SAG available to MCI via LENS and EC-Lite. BellSouth has also offered to provide SAG extracts to MCI. No action need be taken by the Commission.

Issue 3: Has BellSouth provided MCImetro with the due date calculation for a service order request from a customer in compliance with the Telecommunications Act of 1996 and the parties' Interconnection Agreement? If no, what action, if any should the Commission take?

Position: Yes. BellSouth has provided MCI with access to due date information and functions in substantially the same time and manner as BellSouth's access for its retail customers. No action need be taken by the Commission.

Issue 4: Has BellSouth provided MCImetro with access to telephone numbers and telephone number information in compliance with the Telecommunications Act of 1996 and the parties' Interconnection Agreement? If no, what action, if any, should the Commission take?

Position: Yes. BellSouth has provided MCI with telephone numbers and associated information in substantially the same time and manner as BellSouth's access for its retail customers. No action need be taken by the Commission.

Issue 5: Has BellSouth provided MCImetro with access to Universal Service Order Codes (USOCs) in compliance with the Telecommunications Act of 1996 and the parties' Interconnection Agreement? If no, what action, if any, should the Commission take?

Position: Yes. BellSouth has provided MCI access to USOCs in substantially the same time and manner as it does for itself. No action need be taken by the Commission.

Issue 6: Has BellSouth provided MCImetro with customer service record (CSR) information in compliance with the Telecommunications Act of 1996 and the parties' Interconnection Agreement? If no, what action, if any, should the Commission take?

Position: Yes. BellSouth has provided MCI with electronic access to CSR information via LENS and EC-Lite. No action need be taken by the Commission.

Issue 7: Has BellSouth provided MCImetro with service jeopardy notification in compliance with the Telecommunications Act of 1996 and the parties' Interconnection Agreement? If no, what action, if any, should the Commission take?

Position: Yes. BellSouth has provided MCI with service jeopardy notification via LENS and facsimile, depending on the type of electronic interface used for ordering. No action need be taken by the Commission.

Issue 8: Has BellSouth provided MCImetro with firm order confirmations (FOCs) in compliance with the Telecommunications Act of 1996 and the parties' Interconnection Agreement? If no, what action, if any, should the Commission take?

Position: Yes. BellSouth provided MCImetro with appropriate firm order confirmations. No action need be taken by this Commission.

Issue 9: Has BellSouth provided MCImetro with network blockage measurement information in compliance with the Telecommunications Act of 1996 and the parties' Interconnection Agreement? If no, what action, if any, should the Commission take?

Position: Yes. BellSouth has provided MCI with detailed trunk group blocking information regarding trunks used to carry traffic for MCI as well as for BellSouth retail customers. No action need be taken by the Commission.

Issue 10: Has BellSouth provided MCImetro with local tandem interconnection information in compliance with the Telecommunications Act of 1996 and the parties' Interconnection Agreement? If no, what action, if any, should the Commission take?

Position: Yes. BellSouth has provided MCI with information regarding the availability of local tandem interconnection and how such interconnection would be ordered. No action need be taken by the Commission.

Issue 11: Has BellSouth provided MCI metro with recorded usage data in compliance with the Telecommunications Act of 1996 and the parties' Interconnection Agreement? If no, what action, if any, should the Commission take?

Position: Yes. BellSouth provides MCI with access usage records via the Access Daily Usage File. No action need be taken by the Commission.

Issue 12: Has BellSouth provided MCI metro with access to directory listing information in compliance with the Telecommunications Act of 1996 and the parties' Interconnection Agreement? If no, what action, if any, should the Commission take?

Position: Yes. BellSouth has provided MCI with access to directory assistance listings via the Directory Assistance Database Service and Direct Access to Directory Assistance Services. No action need be taken by the Commission.

Issue 13: Has BellSouth provided MCI metro with soft dial tone service in compliance with the Telecommunications Act of 1996 and the parties' Interconnection Agreement? If no, what action, if any, should the Commission take?

Position: Yes. BellSouth has provided MCI with soft dial tone on a competitively neutral basis. No action need be taken by the Commission.

E. Stipulations

There are no stipulations of which BellSouth is aware.

F. Pending Motions

There are no pending motions at this time.

G. Other Requirements

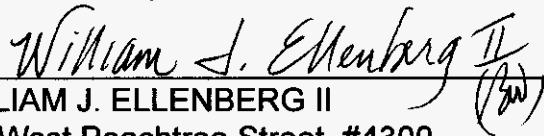
BellSouth knows of no requirement set forth in any prehearing order with which it cannot comply.

Respectfully submitted this 29th day of June, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.



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